

# **Exhibit “C”**

NEW YORK STATE EDUCATION DEPARTMENT  
UNIT OF SCHOOL DISTRICT  
EMPLOYER-EMPLOYEE RELATIONS

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In the Matter of the Charges Preferred By:

DEPARTMENT OF EDUCATION OF THE  
CITY OF NEW YORK,

Complainant-Employer,

v.

SED File No. 23,178

JUANITA MURRAY,

Respondent-Tenured Teacher,

AMENDED SPECIFICATIONS

Pursuant to Education Law Section 2590 (j) (7)  
and Section 3020(a).

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INTRODUCTION

Pursuant to Education Law §3020-a, the New York City Department of Education brings this action, against Juanita Murray, for neglect of duty, failure to follow procedures and carry out normal duties, insubordination, misconduct and incompetent and inefficient service during the 2010-2011, 2011-2012, and 2012-2013 school years. Juanita Murray (hereinafter referred to as "Respondent"), under file number 0666835, Social Security number 090-58-4795 is a tenured teacher, most-recently assigned to Middle School 390, in Bronx County. Respondent holds a "Social Work" license.

### SPECIFICATIONS

1. During the 2010-2011 school year, Respondent was excessively absent and/or in violation of Chancellor's Regulation C-601, as referred to in a letter dated June 2011.
2. Respondent acted unprofessionally and/or exercised poor judgment, in that she provided insufficient information, as requested by administration, in the areas of: strategies or techniques to assist students in meeting their goals; amount of times Respondent met with specific students; intervention techniques used; implications for academic success and/or how to measure student progress, as referred to in a letter dated June 15, 2011.
3. Respondent demonstrated a lack of professional fitness, exercised poor judgment, and/or neglected duties, in that she failed to provide annual student goals and/or the impact of these goals on student performance, as directed by the administration, as referred to in a letter dated June 15, 2012.
4. Respondent demonstrated a lack of professional fitness, exercised poor judgment, and/or neglected duties, in that she failed to attend a scheduled meeting with the principal, as referred to in a letter dated June 15, 2012.
5. Respondent acted unprofessionally, exercised poor judgment, neglected duties, and/or demonstrated a lack of professional fitness, in that she failed to provide school administration with detailed information demonstrating how Respondent helps students reach their annual goals, as referred to in a letter dated June 18, 2012.
6. During the 2011-2012 school year, Respondent was excessively absent and/or in violation of Chancellor's Regulation C-601, as referred to in a letter from June 2012.
7. Respondent demonstrated a lack of professional fitness, exercised poor judgment, and/or neglected duties, in that she was unable to provide plans, activity sheets, goals, objectives, and/or a complete pre-observation worksheet, as referred to in a letter dated October 19, 2012.
8. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment, in that she failed to display a rapport with students; maintain good relationships with school staff; an appropriate professional attitude; appropriate professional growth; supportive relationships with students; resourcefulness; and/or initiative, as referred to in a letter dated January 29, 2013.
9. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment, in that she failed to demonstrate her work with at-risk students; display targeted intervention methods; and/or work with other teachers to develop case loads, as referred to in a letter dated February 8, 2013.

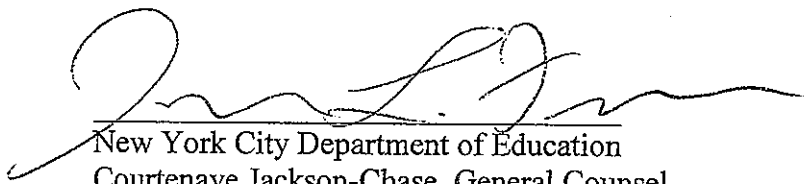
10. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment in that she failed to provide student bio-psychosocial reports with appropriate supporting documentation, as referred to in a letter dated February 8, 2013.
11. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment in that she failed to incorporate case study recommendations in submitted documents, as referred to in a letter dated March 19, 2013.
12. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment in that she failed to adequately complete, submit, and/or prepare student case studies, as referred to in a letter dated March 19, 2013.
13. Respondent acted unprofessionally, neglected duties, and/or exercised poor judgment in that she failed to modify, correct, and/or complete student case studies, as referred to in a letter dated May 10, 2013.
14. Respondent submitted an incomplete binder, as referred to in a letter dated May 24, 2013.
15. Respondent acted unprofessionally, exercised poor judgment, and/or neglected duties, in that she failed to attend a professional support session, as referred to in a letter dated November 9, 2012.
16. Respondent acted unprofessionally and/or neglected duties, in that she failed to prepare, submit, and/or share student progress reports with parents and/or teachers, as referred to in a letter dated November 28, 2012.
17. Respondent acted unprofessionally and/or neglected duties, in that she failed to prepare, complete, and/or submit counseling data needed for IEP's, as referred to in a letter dated January 7, 2013.
18. Respondent failed to follow supervisory directives, acted unprofessionally, neglected duties, and/or exercised poor judgment, in that she failed to intervene when two students became involved in an altercation, as referred to in a letter dated January 16, 2013.
19. Respondent acted unprofessionally, failed to follow supervisory directives, and/or neglected duties, in that she stood idly by the cafeteria exit doors and/or failed to engage with students, as referred to in a letter dated January 30, 2013.
20. Respondent acted unprofessionally, failed to follow supervisory directives, exercised poor judgment, and/or neglected duties, in that she failed to meet with students assigned to her, as referred to in a letter dated February 14, 2013.
21. Respondent acted unprofessionally and/or exercised poor judgment, in that she spoke to the School Aide Supervisor inappropriately and slammed the door in her face, in front of students, as referred to in a letter dated March 6, 2013.

22. During the 2012-2013 school year, Respondent neglected duties, failed to follow supervisory directives, and/or acted unprofessionally, in that she repeatedly failed to submit case study reports.
23. Respondent failed to follow supervisory directives, acted unprofessionally, neglected duties, and/or exercised poor judgment, in that she failed to respond to an emergency situation, as referred to in a letter dated June 18, 2013.
24. Respondent neglected her duties, disregarded student health, safety and well-being, used poor judgment and/or failed to follow school policy and procedure in that she failed to properly and/or adequately handle a complaint made by a parent, as referenced in a letter dated June 28, 2013.
25. Respondent failed to implement recommendations from letters to file, observation conferences, coaching sessions, one to one meetings with school administrators and professional development sessions with regards to:
  - a. Proper planning and/or execution of lessons;
  - b. Classroom environment;
  - c. Differentiation of instruction;
  - d. Maintaining professional and responsible work habits;
  - e. Student assessment and/or conferencing;
  - f. Production/maintenance of required records/documents; and/or
  - g. Classroom management.

THE FOREGOING CONSTITUTES:

1. Just cause for disciplinary action under Education Laws Section 3020-a;
2. Incompetence or inefficient service;
3. Conduct unbecoming Respondent's position and conduct prejudicial to the good order, efficiency, and discipline of the service;
4. Substantial cause rendering Respondent unfit to perform properly, her obligations to the service;
5. Misconduct
6. Neglect of duty;
7. Insubordination and
8. Just cause for termination.

DATED: February 24, 2015

  
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